

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
IN RE:	:	
	:	25-md-3143 (SHS) (OTW)
OPENAI, INC., COPYRIGHT	:	
INFRINGEMENT LITIGATION	:	Hon. Sidney H. Stein
-----	X	Hon. Ona T. Wang
	:	
THIS DOCUMENTS RELATES TO:	:	
	:	
All Actions.	:	
-----	X	

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Brian M. Kramer hereby moves this Court for an Order for admission to practice *pro hac vice* and to appear as counsel for OpenAI Inc.; OpenAI LLC; OAI Corporation LLC; OpenAI Global LLC; OpenAI GP LLC; OpenAI Holdings LLC; OpenAI LP; OpenAI OpCo LLC; OpenAI Startup Fund GP I LLC; OpenAI Startup Fund I LP; OpenAI Startup Fund Management LLC (“OpenAI”), in the above-captioned actions.

I am in good standing of the bar of the State of California, and a certificate of good standing for that jurisdiction is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony and have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3.

Dated: May 5, 2025

MORRISON & FOERSTER LLP

By: /s/ Brian M. Kramer

Brian M. Kramer
 BMKramer@mofo.com
 12531 High Bluff Drive, Suite 100
 San Diego, CA 92130
 Telephone: (858) 314-5415
 Facsimile: (858) 720-5125

Attorney for Defendants
 OPENAI INC.; OPENAI LLC; OAI
 CORPORATION LLC; OPENAI
 GLOBAL LLC; OPENAI GP LLC;
 OPENAI HOLDINGS LLC; OPENAI LP;
 OPENAI OPCO LLC; OPENAI
 STARTUP FUND GP I LLC; OPENAI
 STARTUP FUND I LP; and OPENAI
 STARTUP FUND MANAGEMENT LLC